

EXHIBIT 16

Becka, Lyle

November 6, 2018

1

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

-----X
NORTHSTAR AVIATION, LLC, et al., :
Plaintiffs/Counterclaim Defendants, : Civil Action
vs. : No. 1:18cv191-
ALDEN BURT ALBERTO, : TSE-JFA
Defendant/Counterclaim Plaintiff. :
-----X

VIDEOTAPED DEPOSITION OF LYLE BECKA

McLean, Virginia

Tuesday, November 6, 2018

9:32 a.m.

Reported by: Elizabeth Mingione, RPR

Job No.: 44471

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2	4
<p>1</p> <p>2 Videotaped deposition of LYLE BECKA, held at</p> <p>3 the offices of Berenzweig Leonard, LLP, 8300</p> <p>4 Greensboro Drive, Suite 1250, McLean, Virginia,</p> <p>5 commencing at 9:32 a.m., Tuesday, November 6, 2018,</p> <p>6 before Elizabeth Mingione, Registered Professional</p> <p>7 Reporter and Notary Public for the Commonwealth of</p> <p>8 Virginia.</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>	<p>1</p> <p>2</p> <p>3 ALSO PRESENT</p> <p>4 Nancy Holmstock, Videographer</p> <p>5 Alden Burt Alberto</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>
3	5
<p>1 APPEARANCES OF COUNSEL:</p> <p>2 ON BEHALF OF PLAINTIFF:</p> <p>3 DUNLAP, BENNETT & LUDWIG</p> <p>4 Kevin T. Streit, Esquire</p> <p>5 8003 Franklin Farms Drive, Suite 220</p> <p>6 Richmond, Virginia 23229</p> <p>7 (804) 620-7262</p> <p>8 Kstreit@dbllawyers.com</p> <p>9</p> <p>10 ON BEHALF OF THE DEFENDANT:</p> <p>11 BERENZWEIG LEONARD</p> <p>12 Nicholas R. Johnson, Esquire</p> <p>13 Declan C. Leonard, Esquire</p> <p>14 Clyde Findley, Esquire</p> <p>15 David B. Deitch, Esquire</p> <p>16 8300 Greensboro Drive, Suite 1250</p> <p>17 McLean, Virginia 22102</p> <p>18 (703) 760-0402</p> <p>19 Njohnson@berenzweiglaw.com</p> <p>20 Dleonard@berenzweiglaw.com</p> <p>21 Cfindley@berenzweiglaw.com</p> <p>22 Ddeitch@berenzweiglaw.com</p>	<p>1 CONTENTS</p> <p>2 WITNESS: LYLE BECKA</p> <p>3 EXAMINATION BY: PAGE</p> <p>4 Mr. Johnson 7</p> <p>5</p> <p>6 * * *</p> <p>7</p> <p>8 DEPOSITION EXHIBITS</p> <p>9 NUMBER DESCRIPTION PAGE</p> <p>10 Exhibit 1 Bonus Payments Document NSA014873 .. 70</p> <p>11 Exhibit 2 Text Messages 85</p> <p>12 Exhibit 3 Employment Agreement 96</p> <p>13 Exhibit 4 E-Mail October 26, 2017,</p> <p>14 Alberto_05054 140</p> <p>15 Exhibit 5 E-Mail October 27, 2017, NSA001091 . 145</p> <p>16 Exhibit 6 E-Mail November 6, 2017, NSA015060 . 151</p> <p>17 Exhibit 7 E-Mail March 12, 2018, NSA011855 ... 167</p> <p>18 Exhibit 8 E-Mail, November 21, 2017, NSA011925 180</p> <p>19 Exhibit 9 Contracts and Business Projections,</p> <p>20 NSA012940 185</p> <p>21 Exhibit 10 NorthStar Financial Statements 199</p> <p>22</p>

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<p style="text-align: right;">6</p> <p style="text-align: center;">P R O C E E D I N G S</p> <p>1 VIDEOGRAPHER: This is video number 1 in</p> <p>2 the video recorded deposition of Lyle Becka, taken by</p> <p>3 defendant's counsel in the matter of NorthStar</p> <p>4 Aviation, LLC, et al., Plaintiffs/counterclaim</p> <p>5 defendants, versus Alden Burt Alberto,</p> <p>6 defendant/counterclaim plaintiff, pending before the</p> <p>7 United States District Court for the Eastern of --</p> <p>8 excuse me, for the Eastern District of Virginia, Civil</p> <p>9 Action Number 1:18cv191.</p> <p>10</p> <p>11 This deposition is being held at the law</p> <p>12 office of Bertzwingler -- Berenzweig Leonard located at</p> <p>13 8300 Greensboro Drive, McLean, Virginia, on November</p> <p>14 6, 2018. The time is 9:32 a.m. My name is Nancy</p> <p>15 Holmstock, video operator representing the firm of</p> <p>16 Henderson Legal Services. Court reporter today is Liz</p> <p>17 Mingione in association with Henderson Legal Services.</p> <p>18 For the record, will counsel now please</p> <p>19 introduce themselves and whom they represent.</p> <p>20 MR. JOHNSON: Good morning. Nick Johnson</p> <p>21 with the law firm of Berenzweig Leonard, representing</p> <p>22 Mr. Alberto.</p>	<p style="text-align: right;">8</p> <p>1 in the Eastern District of Virginia?</p> <p>2 A. I do.</p> <p>3 Q. Okay. Mr. Becka, have you ever had your</p> <p>4 deposition taken before?</p> <p>5 A. I have not.</p> <p>6 Q. Have you ever testified in a court of law?</p> <p>7 A. I have not.</p> <p>8 Q. Okay. You sat in for Ali's deposition, so</p> <p>9 you kind of know the drill, but --</p> <p>10 A. I did.</p> <p>11 Q. -- the most important thing about today is</p> <p>12 that you and I understand each other. If I ask a</p> <p>13 question and you don't understand it, please just say</p> <p>14 so, and I'm happy to rephrase.</p> <p>15 A. Okay.</p> <p>16 Q. Everything that you are saying today is</p> <p>17 being transcribed by a court reporter, so you must</p> <p>18 respond verbally and audibly. You understand that you</p> <p>19 are here testifying under oath, and that you must</p> <p>20 testify truthfully. You understand that, right?</p> <p>21 A. I do.</p> <p>22 Q. Okay. If at any point throughout the</p>
<p style="text-align: right;">7</p> <p>1 MR. LEONARD: Declan Leonard for the</p> <p>2 defendant/counterplaintiff Reno Alberto.</p> <p>3 MR. FINLEY: And Clyde Findley, also for</p> <p>4 defendant Alden Burt Alberto.</p> <p>5 VIDEOGRAPHER: Will the court reporter</p> <p>6 please administer the oath.</p> <p>7 - - -</p> <p>8 Whereupon,</p> <p>9 LYLE BECKA,</p> <p>10 having been first duly sworn was</p> <p>11 examined and testified as follows:</p> <p>12 - - -</p> <p>13 EXAMINATION CONDUCTED</p> <p>14 BY MR. JOHNSON:</p> <p>15 Q. Good morning, Mr. Becka.</p> <p>16 A. Good morning.</p> <p>17 Q. Can you please state your name for the</p> <p>18 record.</p> <p>19 A. Lyle Becka.</p> <p>20 Q. Mr. Becka, you understand that you are here</p> <p>21 today to be deposed in the matter of NorthStar</p> <p>22 Aviation versus Alden Burt Alberto, currently pending</p>	<p style="text-align: right;">9</p> <p>1 course of today's deposition you need to take a break,</p> <p>2 I'm happy to do so, restroom, water, what have you.</p> <p>3 My only request is that if there is a question</p> <p>4 pending, I'd request that you answer the question and</p> <p>5 then we can take a break. Is that fair?</p> <p>6 A. That is fair.</p> <p>7 Q. Okay. Throughout the course of today's</p> <p>8 deposition, NorthStar's counsel may make various</p> <p>9 objections to preserve the record. But unless you are</p> <p>10 directed not to respond, you understand that you need</p> <p>11 to answer my questions?</p> <p>12 A. I do.</p> <p>13 Q. Okay. Let's just first start with who you</p> <p>14 talked to in preparation for today's deposition.</p> <p>15 Other than counsel, who did you talk to about today's</p> <p>16 deposition?</p> <p>17 A. Just counsel.</p> <p>18 Q. Okay. Did you talk to Dr. Ahmed about</p> <p>19 today's deposition?</p> <p>20 A. No.</p> <p>21 Q. Okay. What about Salem AlDhaheeri?</p> <p>22 A. I did not.</p>

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<p style="text-align: right;">14</p> <p>1 performance under that contract?</p> <p>2 A. No.</p> <p>3 Q. Okay. Is this litigation affecting the</p> <p>4 staffing of that contract?</p> <p>5 A. No.</p> <p>6 Q. How is this litigation affecting your</p> <p>7 performance, if at all, under the UAE contract?</p> <p>8 A. It is not.</p> <p>9 Q. Okay. What about subcontractors? Have you</p> <p>10 talked to any of your subcontractors about this</p> <p>11 litigation?</p> <p>12 A. I may have.</p> <p>13 Q. Okay.</p> <p>14 A. Just to state that --</p> <p>15 Q. I'm sorry?</p> <p>16 A. Just to state that, you know, we are in</p> <p>17 litigation.</p> <p>18 Q. Okay. Did they ask or did you volunteer</p> <p>19 this information?</p> <p>20 A. They may have asked.</p> <p>21 Q. Okay.</p> <p>22 A. I can't remember exactly who I spoke to.</p>	<p style="text-align: right;">16</p> <p>1 A. Yes.</p> <p>2 Q. How much time did you spend talking about</p> <p>3 this litigation?</p> <p>4 A. Not that long, maybe a minute.</p> <p>5 Q. Did you indicate to General Toumajan that</p> <p>6 he could be a witness in this case?</p> <p>7 A. No.</p> <p>8 Q. What about Bell, have you talked to anyone</p> <p>9 at Bell about this litigation?</p> <p>10 A. I made them aware of it. Yes.</p> <p>11 Q. Who did you talk to?</p> <p>12 A. Robert Dompka.</p> <p>13 Q. And what is his position?</p> <p>14 A. He is director of programs, I believe.</p> <p>15 Q. And when did you talk to Mr. Tompko?</p> <p>16 A. Dompka.</p> <p>17 Q. Tompka. When did you talk to Mr. Tompka?</p> <p>18 A. It would have been March of 2018.</p> <p>19 Q. Okay. So shortly after the lawsuit was</p> <p>20 filed?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. And why did you talk to Mr. Dompka</p>
<p style="text-align: right;">15</p> <p>1 Q. You don't remember who you talked to?</p> <p>2 A. Not in total. No.</p> <p>3 Q. Okay. When you were having discussions</p> <p>4 with General Toumajan, did you talk about Reno</p> <p>5 specifically?</p> <p>6 A. Obviously I would have if he's the</p> <p>7 defendant in the case.</p> <p>8 Q. And what did you say about Reno?</p> <p>9 A. I said we have a pending lawsuit against</p> <p>10 Reno.</p> <p>11 Q. And that's it?</p> <p>12 A. Hmm.</p> <p>13 Q. You didn't say anything about how he was as</p> <p>14 CEO?</p> <p>15 A. Well, he knew he was the CEO.</p> <p>16 Q. Okay. Did you say anything about your</p> <p>17 impressions on Reno as the CEO?</p> <p>18 A. No.</p> <p>19 Q. How long was the conversation?</p> <p>20 A. Probably five minutes.</p> <p>21 Q. Did you talk about things other than this</p> <p>22 litigation?</p>	<p style="text-align: right;">17</p> <p>1 about this litigation?</p> <p>2 A. We were in discussions about the path</p> <p>3 forward between NorthStar and Bell, and I figured they</p> <p>4 need to be aware of it.</p> <p>5 Q. Was that relationship damaged in some way?</p> <p>6 A. It was.</p> <p>7 Q. And what do you mean by that? Elaborate.</p> <p>8 A. It was. They had very much planned to move</p> <p>9 ahead without NorthStar on several fronts. When I</p> <p>10 went to Dubai air show, the -- their managing director</p> <p>11 for Middle East sales, he actually made the comment to</p> <p>12 me that I made his life more difficult because he had</p> <p>13 already planned on this course of action of moving</p> <p>14 ahead without NorthStar. And with me coming back now,</p> <p>15 he had to think about how Bell was going to react.</p> <p>16 Q. What's the current status of the situation</p> <p>17 with Bell?</p> <p>18 A. We have a good relationship with Bell. We</p> <p>19 are working together in certain areas. In certain</p> <p>20 areas we are working apart, but we have a good</p> <p>21 relationship with Bell.</p> <p>22 Q. Did you lose any opportunities with Bell?</p>

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<p style="text-align: right;">18</p> <p>1 A. It's hard to tell.</p> <p>2 Q. Can you identify one?</p> <p>3 A. Not that -- no, not today I can't.</p> <p>4 Q. Okay. What are the projects that you are</p> <p>5 working with Bell on since Mr. Alberto left the</p> <p>6 company?</p> <p>7 A. A project for the UAE Armed Forces and a</p> <p>8 project in Iraq.</p> <p>9 Q. Have those contracts been awarded?</p> <p>10 A. They have not.</p> <p>11 Q. Sorry?</p> <p>12 A. They have not.</p> <p>13 Q. Okay. Do they have -- have those</p> <p>14 governments issued an anticipated award date?</p> <p>15 A. For the UAE, it's anticipated to be</p> <p>16 December.</p> <p>17 Q. Okay. And what's the value of that</p> <p>18 opportunity with UAE?</p> <p>19 A. Approximately 62.7 million.</p> <p>20 Q. How do you feel about your chances to win</p> <p>21 that contract?</p> <p>22 A. 99 percent.</p>	<p style="text-align: right;">20</p> <p>1 ask about it?</p> <p>2 A. He may have asked about it. I don't</p> <p>3 remember the exact conversation.</p> <p>4 Q. What's your understanding as to how</p> <p>5 Mr. Bardawil learned about it?</p> <p>6 A. I think he may have asked what's happening</p> <p>7 with Reno.</p> <p>8 Q. And what was your response?</p> <p>9 A. I said, well, we have a -- you know, we are</p> <p>10 pending litigation with Reno, so --</p> <p>11 Q. And that's it?</p> <p>12 A. Pretty much. Yeah.</p> <p>13 Q. Have you talked to anyone that used to work</p> <p>14 at Presidential Airways about this litigation?</p> <p>15 A. Richard Pere.</p> <p>16 Q. Anyone else?</p> <p>17 A. Not that I can think of. No.</p> <p>18 Q. And, I'm sorry, Rich O'Pare, you said?</p> <p>19 A. Pere.</p> <p>20 Q. Pere. Okay. When did you talk to Mr.</p> <p>21 Pere?</p> <p>22 A. Probably in the spring.</p>
<p style="text-align: right;">19</p> <p>1 Q. What about Iraq?</p> <p>2 A. Iraq, we feel good about it. With the</p> <p>3 changes in government, it's hard to tell but --</p> <p>4 Q. What's the value of that contract?</p> <p>5 A. 168 million.</p> <p>6 Q. And so those are the two opportunities that</p> <p>7 you are pursuing with Bell, UAE and Iraq?</p> <p>8 A. Yes.</p> <p>9 Q. Any others?</p> <p>10 A. Not at this point.</p> <p>11 Q. Okay. Is it fair to say that you have a</p> <p>12 pretty good relationship with Bell now?</p> <p>13 A. We do have a good relationship with Bell</p> <p>14 now.</p> <p>15 Q. Okay. Have you ever talked to Philip</p> <p>16 Bardawil?</p> <p>17 A. Um-hmm.</p> <p>18 Q. Did you talk to Mr. Bardawil about this</p> <p>19 litigation?</p> <p>20 A. I told him it was -- that we had the case</p> <p>21 pending. Yes.</p> <p>22 Q. Did he volunteer that information or did he</p>	<p style="text-align: right;">21</p> <p>1 Q. And tell me about the conversation with Mr.</p> <p>2 Pere about this litigation.</p> <p>3 A. Primarily that we had litigation moving</p> <p>4 forward.</p> <p>5 Q. How have you described the litigation?</p> <p>6 A. In what?</p> <p>7 Q. Well, did you say it's going well? Did you</p> <p>8 say it's going poorly? How did you describe it?</p> <p>9 A. It was -- it was fairly early on that I had</p> <p>10 the conversation with him because, you know, we just</p> <p>11 filed it in -- was it February. So it would have been</p> <p>12 fairly early on. Probably said I feel good about it</p> <p>13 because we are in the right.</p> <p>14 Q. What about Erik Prince? Have you talked to</p> <p>15 Erik Prince about this litigation?</p> <p>16 A. Yes.</p> <p>17 Q. When?</p> <p>18 A. Last month.</p> <p>19 Q. Tell me about that conversation.</p> <p>20 A. I gave him an update of the fact that we</p> <p>21 are under litigation, and the value of it. And it was</p> <p>22 part of an overall conversation I had with him last</p>

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<p style="text-align: right;">54</p> <p>1 of that services agreement?</p> <p>2 A. It was a vehicle to get NorthStar started.</p> <p>3 Q. What's the status of that services</p> <p>4 agreement?</p> <p>5 A. I would imagine it's no longer valid.</p> <p>6 Q. What makes you think that?</p> <p>7 A. If R2 is no longer a going concern, then</p> <p>8 how can it be a valid agreement.</p> <p>9 Q. Are you aware of that agreement ever being</p> <p>10 terminated?</p> <p>11 A. I'm not. No.</p> <p>12 Q. When did you first learn about that</p> <p>13 agreement?</p> <p>14 A. I remember parts of it back in 2012.</p> <p>15 Q. Were you presented with the agreement?</p> <p>16 A. I think mostly because we were trying to</p> <p>17 figure out what -- what prices we would pay for</p> <p>18 services and how much we would pay for hangar rent.</p> <p>19 Q. And why would you need to reference that</p> <p>20 agreement then?</p> <p>21 A. I'm sorry?</p> <p>22 Q. I just don't understand why you would need</p>	<p style="text-align: right;">56</p> <p>1 Q. Have you ever talked to the sheikh about</p> <p>2 the services agreement?</p> <p>3 A. No.</p> <p>4 Q. Have you ever talked to Salem about the</p> <p>5 services agreement?</p> <p>6 A. No.</p> <p>7 Q. Have you ever talked to Magda about the</p> <p>8 services agreement?</p> <p>9 A. No.</p> <p>10 Q. Does magda still work for the company?</p> <p>11 A. I don't know. Which company?</p> <p>12 Q. NorthStar.</p> <p>13 A. She never worked for NorthStar.</p> <p>14 Q. Okay. Who does she work for?</p> <p>15 A. I assume Rotana Jet. I don't know.</p> <p>16 Q. Okay. How long were you employed by</p> <p>17 NorthStar?</p> <p>18 A. Until -- whenever it started, until</p> <p>19 September 2017.</p> <p>20 Q. And you subsequently obviously have been</p> <p>21 reemployed by NorthStar, right?</p> <p>22 A. Yes.</p>
<p style="text-align: right;">55</p> <p>1 to reference a services agreement for determining</p> <p>2 rent?</p> <p>3 A. It was in there.</p> <p>4 Q. Okay. And so you personally reviewed the</p> <p>5 agreement?</p> <p>6 A. I don't remember seeing all of it at the</p> <p>7 time.</p> <p>8 Q. But it's your understanding that the</p> <p>9 services agreement provided that one of the parties to</p> <p>10 that agreement was to provide rent or provide a leased</p> <p>11 space?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. And which company was that?</p> <p>14 A. Rotana.</p> <p>15 Q. Okay. Is it your understanding that the</p> <p>16 parties operated and performed consistent with that</p> <p>17 services agreement?</p> <p>18 MR. STREIT: Objection to form.</p> <p>19 A. I don't know.</p> <p>20 Q. Are you aware of them not performing under</p> <p>21 that agreement?</p> <p>22 A. I don't know.</p>	<p style="text-align: right;">57</p> <p>1 Q. I'll just refer to that time frame from</p> <p>2 when the company was formed, until September 2017,</p> <p>3 just as your initial employment.</p> <p>4 A. Okay.</p> <p>5 Q. With NorthStar. During your initial</p> <p>6 employment with NorthStar, was Dr. Ahmed, or the</p> <p>7 sheikh, was he involved in running the company?</p> <p>8 A. Not that I know of.</p> <p>9 Q. Okay. Are you aware of him performing any</p> <p>10 services for the company?</p> <p>11 A. I wouldn't know.</p> <p>12 Q. Okay. Sitting here today, can you think</p> <p>13 of --</p> <p>14 A. You are talking initial employment.</p> <p>15 Q. Yes. Yes.</p> <p>16 A. No.</p> <p>17 Q. Okay. So sitting here today, you can't</p> <p>18 think of a single thing that he did?</p> <p>19 A. I would expect that he -- given his</p> <p>20 connections, I would expect that he was involved in</p> <p>21 securing the contract and forming NorthStar and</p> <p>22 providing some weight to the NorthStar organization.</p>

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<p style="text-align: right;">138</p> <p>1 Q. Okay. But you communicated with the State</p> <p>2 Department in response to Mr. Alberto's letter to the</p> <p>3 State Department, right?</p> <p>4 A. We sent the letter. We sent our letter</p> <p>5 changing the management representative and the change</p> <p>6 of office location.</p> <p>7 Q. Okay. And that was accepted, right?</p> <p>8 MR. STREIT: Object to the form.</p> <p>9 A. I believe so.</p> <p>10 Q. That change was approved by the State</p> <p>11 Department?</p> <p>12 A. I believe so. Yes.</p> <p>13 Q. Okay. Okay. And you didn't lose any</p> <p>14 business as a result of the letter that Mr. Alberto</p> <p>15 sent?</p> <p>16 A. Not that I know of.</p> <p>17 Q. Okay. And what about the letter to the UAE</p> <p>18 AF? You didn't lose any business as a result of that</p> <p>19 letter either, right?</p> <p>20 A. I wouldn't know.</p> <p>21 Q. Well sitting here today, can you identify</p> <p>22 any specific business that you lost as a result of the</p>	<p style="text-align: right;">140</p> <p>1 Q. Up to Dr. Said?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. Since being reemployed, how would</p> <p>4 you characterize or how would you describe Dr. Saif's</p> <p>5 involvement in the company?</p> <p>6 A. He is interested and engaged. He has</p> <p>7 communicated with the UAE government. He also</p> <p>8 approves every expenditure.</p> <p>9 Q. Okay. And were there any other changes to</p> <p>10 company operations that took place after you were</p> <p>11 reemployed?</p> <p>12 A. Could you explain in a little more detail?</p> <p>13 Q. Sure. You know what, let me hand you a</p> <p>14 document, actually. I would like this to be marked as</p> <p>15 Exhibit 4.</p> <p>16 - - -</p> <p>17 (A document was marked as Deposition</p> <p>18 Exhibit 4.)</p> <p>19 - - -</p> <p>20 BY MR. JOHNSON:</p> <p>21 Q. Mr. Becka, do you recognize this document?</p> <p>22 A. It appears to be an e-mail from Kate</p>
<p style="text-align: right;">139</p> <p>1 letter that Mr. Alberto sent to the UAE AF?</p> <p>2 A. I can't identify any business that we lost.</p> <p>3 Was there a potential business that we could have had</p> <p>4 otherwise, I don't know.</p> <p>5 Q. Okay. But you can't identify any business</p> <p>6 or potential business, right?</p> <p>7 A. Not that I know of.</p> <p>8 Q. Okay. When you were -- well, strike that.</p> <p>9 What was your start date when you were</p> <p>10 rehired -- when you were rehired?</p> <p>11 A. October 27th.</p> <p>12 Q. And what was your position when you were</p> <p>13 rehired?</p> <p>14 A. Vice President Operations, I believe.</p> <p>15 Q. Okay. Is that equivalent to CEO?</p> <p>16 A. No.</p> <p>17 Q. Okay. Is there a CEO of NorthStar?</p> <p>18 A. No.</p> <p>19 Q. Okay. Who do you report to?</p> <p>20 A. Dr. Bin Saif.</p> <p>21 Q. Do you anticipate hiring a CEO?</p> <p>22 A. I don't know yet. That will be up to him.</p>	<p style="text-align: right;">141</p> <p>1 Beckley to NorthStar staff.</p> <p>2 Q. And you received this e-mail, right?</p> <p>3 A. I don't believe did.</p> <p>4 Q. If you look at the "To" line on the second</p> <p>5 line in between Chad Krueger and Robert T, that's your</p> <p>6 name, right?</p> <p>7 A. It is my name there, but at the time,</p> <p>8 October 26, I don't think I had access to NorthStar</p> <p>9 e-mail.</p> <p>10 Q. Okay. So when did you regain access to</p> <p>11 NorthStar e-mail?</p> <p>12 A. It would have been likely the 27th or the</p> <p>13 Sunday.</p> <p>14 Q. Okay. And when you regained access did you</p> <p>15 then have access to the e-mails that were sent to you</p> <p>16 prior to that date?</p> <p>17 A. Probably.</p> <p>18 Q. Okay. So, I mean, if you were --</p> <p>19 A. I don't know. It may have -- my e-mail</p> <p>20 mailbox may have been shut off so it wouldn't accept.</p> <p>21 I don't know.</p> <p>22 Q. Okay. Okay. Well, the e-mail itself, if</p>

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Becka, Lyle

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50 (Pages 194 to 197)

<p style="text-align: right;">194</p> <p>1 under that opportunity with Bell?</p> <p>2 A. Could be anyone.</p> <p>3 Q. Okay. UAE?</p> <p>4 A. No.</p> <p>5 Q. Okay. Would this be with the Middle East</p> <p>6 or where?</p> <p>7 A. If you read this, this is -- this is</p> <p>8 originally limited, the scope is originally limited in</p> <p>9 the teaming agreement to the MENA region, but it could</p> <p>10 have been opened up to other areas.</p> <p>11 Q. Okay.</p> <p>12 A. It's crawl, walk, run.</p> <p>13 Q. Okay. The next full paragraph talks about</p> <p>14 an opportunity with the government of Kuwait. What's</p> <p>15 the status of that?</p> <p>16 A. That is stalled at this point in time.</p> <p>17 Q. What's your understanding as to why it's</p> <p>18 stalled?</p> <p>19 A. Because I haven't done anything with it.</p> <p>20 Q. Is that the same Kuwait opportunity that's</p> <p>21 referenced in the complaint in this litigation?</p> <p>22 A. Yes.</p>	<p style="text-align: right;">196</p> <p>1 the exact.</p> <p>2 Q. Okay. So --</p> <p>3 A. Yeah.</p> <p>4 Q. The person that -- and, I'm sorry, so was</p> <p>5 it Terry or Reno that sent the e-mail?</p> <p>6 A. I don't know.</p> <p>7 Q. Okay.</p> <p>8 A. I don't remember. I've seen it, but I've</p> <p>9 seen a lot of things, so I'd have to go back and --</p> <p>10 Q. But sitting here today, you can't recall</p> <p>11 who it was?</p> <p>12 A. I can't remember who it was.</p> <p>13 Q. Okay.</p> <p>14 A. I've looked at too many documents.</p> <p>15 Q. As you sit here today, can you identify any</p> <p>16 contracts that NorthStar has lost as a result of Mr.</p> <p>17 Alberto's conduct?</p> <p>18 A. Physical contracts, no.</p> <p>19 Q. As you sit here today, can you identify any</p> <p>20 contracts that NorthStar has lost as a result of</p> <p>21 Vulcan's alleged conduct?</p> <p>22 A. No.</p>
<p style="text-align: right;">195</p> <p>1 Q. Are you aware of any -- strike that.</p> <p>2 What specifically are you aware of Mr.</p> <p>3 Alberto doing to interfere with that opportunity with</p> <p>4 Kuwait?</p> <p>5 A. I would have to go back and recheck, but I</p> <p>6 believe it was primarily limited to a request to stop</p> <p>7 any and all work with Kuwait with the representative</p> <p>8 at the time.</p> <p>9 Q. Mr. Alberto said that?</p> <p>10 A. I don't remember if it was Mr. Alberto or</p> <p>11 Mr. Key.</p> <p>12 Q. Okay. So the evidence that you have of Mr.</p> <p>13 Alberto interfering with an opportunity with Kuwait is</p> <p>14 an e-mail from either him or Mr. Key alleging to stop</p> <p>15 work?</p> <p>16 A. I would have to go back and look. I don't</p> <p>17 remember off the top of my head what is there.</p> <p>18 Q. And is it your understanding that that</p> <p>19 e-mail was sent to someone who was a representative of</p> <p>20 the government of Kuwait?</p> <p>21 A. I believe he was a representative of or</p> <p>22 ties with the government of Kuwait. I don't remember</p>	<p style="text-align: right;">197</p> <p>1 Q. Prior to you being reemployed by NorthStar,</p> <p>2 you were previously not involved in preparation of the</p> <p>3 company's financial statements, right?</p> <p>4 A. That is correct.</p> <p>5 Q. Once you were reemployed, were you then</p> <p>6 involved in the preparation of the company's financial</p> <p>7 statements?</p> <p>8 A. Somewhat.</p> <p>9 Q. Okay. Were you involved in preparing the</p> <p>10 company's 2017 financial statement?</p> <p>11 A. Extremely limited.</p> <p>12 Q. What was your involvement?</p> <p>13 A. Generally providing this and providing any</p> <p>14 documentation that they had asked for.</p> <p>15 Q. Did you personally interface with -- well,</p> <p>16 let me go back. Deloitte prepared the company's</p> <p>17 financial statements, right?</p> <p>18 A. That's correct.</p> <p>19 Q. Did you personally interface with</p> <p>20 representatives of Deloitte?</p> <p>21 A. I did.</p> <p>22 Q. Okay. And who did you interface with?</p>